Riverside
TOOL CORP.

July 8, 2014

Leslie,

Please find enclosed Riverside Tool Corp.'s response to your Request for Information Pursuant to Section 104(e) of CERCLA regarding the Lane Street Ground Water Contamination Site located in Elkhart, Elkhart County, Indiana CERCLIS ID No: INN000510229 which we received June 11, 2014.

Riverside Tool Corp. made every effort possible to cooperate with your request and if you have any further questions related to our response please do not hesitate to contact me.

Sincerely,

Ron Migedt
President
Riverside Tool Corp.

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Question 1

Exemption 6, 5 U.S.C. §552(b)(6)

Riverside Tool Corp. currently operates at 3504 Henke St, Elkhart, IN 46514 and has done so since 2004. Riverside Tool Corp. does not own the building but leases it from RJM Enterprises LLC ([redacted]). Riverside Tool Corp. did not have any knowledge of hazardous substance disposal on or at the site when it moved to the site in 2004. Riverside Tool Corp. was aware that RJM Enterprises LLC commissioned a Phase 1 site survey which showed no major issues to Riverside's knowledge. A copy of the Phase 1 site survey and other previous site surveys (performed on the Site but for other companies) are enclosed (Attachment 1) for your review.

Question 2

Riverside Tool Corp. manufactures and services cutting tools for the woodworking and plastics industries. The products it produces typically consist of aluminum, steel, and tungsten carbide. None of the products it produces contain hazardous materials, and none of the core production processes produce hazardous wastes. However, there are a few items used by Riverside Tool that have components that are classified as hazardous according to information provided within the MSDS / SDS Sheets (Attachment 2). These items are mostly used for housekeeping, maintenance, and auxiliary processes and are covered in more detail in our response to Question 6.

Question 3

The cutting tools manufactured and serviced by Riverside Tool are machined and ground within the facility and many times are put through a black oxide process or electroplating process before shipment.

Two flow diagrams illustrating these processes, referenced as 'New Tooling Flow Diagram' and 'Tool Servicing Flow Diagram' , are attached as separate documents (Attachment 3). Also attached are all of our MSDS and/or SDS Sheets (Attachment 2) that we have on file.

For cutting tool service and manufacturing (SIC 3545), coolants, lubricants, and cleaning solutions are utilized during machining, grinding, and cleaning of metal. These chemicals are as follows (See MSDS/SDS Sheets for details):

- Clearedge 6519
- SharpCool Premium Semi-Synthetic Metalworking Fluid
- IonoPlus 3000 ET
- GrindKlean
- Transogrind 250
- Transogrind EXP Grinding Fluid
- De-ionized water
- X10

All liquids are re-circulated within the machine. When machines require cleaning or maintenance, the lubricant/coolant/cleaning solution is transferred out of the machine into the designated container (Disposal Tote 2) which is periodically pumped out by Safety Kleen Systems, Inc for proper disposal at on off-site, permitted facility. All of the invoices from Safety Kleen Systems, Inc that we have on file have been included as Attachment 4.

For Electroplating and Black Oxide conditioning of tools (SIC 3471), tools are dipped in various liquids. Below is a sequential listing of the chemicals that tools are moved through for each process (See MSDS Book for details):

Black Oxide Process

- Safe Scrub ST Biodegradable Cleaner
- De-Ionized Water
- Birchwood Casey Oxyprime Surface Conditioner
- De-Ionized Water
- Tru Temp XL Blackener
- De-Ionized Water
- Dri-Touch Plus IPR3 Rust Preventative

Electroplating Process

- Electroscrub
- De-Ionized Water
- De-Ionized Water
- Metal Activator Solution
- De-Ionized Water
- De-Ionized Water
- Bright Nickel Solution
- De-Ionized Water
- De-Ionized Water
- Bright Copper Catalyst & Bright Copper MakeUp (Combined)
- De-Ionized Water
- De-Ionized Water
- Bright Nickel Solution
- De-Ionized Water

Stripping of ElectroPlating

- Electro-Strip
- De-Ionized Water & Baking Soda (Combined)
- De-Ionized Water

The De-Ionized Water listed above is transferred to a designated container (Disposal Tote 1) periodically for proper disposal with Safety Kleen Systems, Inc. and refilled with De-Ionized Water. The need for off-site disposal of any other chemicals listed is rare, and if needed are

transferred to the designated container (Disposal Tote 1) for removal/disposal using Safety Kleen Systems, Inc..

A common byproduct of processing tungsten carbide, tool steel, and PCD (Polycrystalline Diamond) is sludge. Riverside Tool Corp. filters this sludge from the grinding coolant and recycles the filters with the manufacturer of the filters. Accumulated sludge is stored in a labelled container and periodically shipped to a recycler.

Question 4

Riverside Tool Corp. had laboratory analyses performed on samples collected from the disposal totes that contain liquid produced from it's manufacturing processes. The results of the lab analysis for each disposal tote are included as Attachment 6. You will note that the lab tests did indicate the presence of Tetrachloroethene which we believe to be the result of our limited use of an aerosol chlorinated Brake Cleaner during machine maintenance, remnants of which are discharged to the disposal tote as a result of floor clean-up (wash down). Additional details of this operation are provided in the Question 6 response.

Question 5

The only rinse water used at Riverside Tool Corp. is used in the black oxide and electroplating processes. All rinse water is contained in 5 gallon buckets and poured into the disposal tote when it needs to be refreshed. No rinse water is discharged into the sewer, on to the ground, or direct to waterways (off-site disposal by Safety-Kleen only).

Riverside does not require a wastewater discharge permit, but the City of Elkhart, as a procedural policy asked Riverside to fill out an application for a discharge permit in order to prove it had no need for one. A copy of that application has been included as Attachment 6.

Question 6

As previously noted, Riverside Tool has identified through our review of MSDS/SDS Sheets, certain hazardous substances contained within some of the products used as part of our processes.

a. As per a phone call with Leslie Blake on 6/26/2014, we will be reading sub-question (a.) as pertaining to "hazardous substances", not "non-hazardous" as the original copy indicates. Riverside Tool Corp. does not handle a large quantity of hazardous substances. However our MSDS / SDS book does show some items in our facility to contain varying amounts of hazardous substances. Because you noted in Enclosure 1 that your investigation is focusing on potential sources of trichloroethylene and other chlorinated solvents, we will address the items in

our inventory that contain those substances first, then we will list the remaining hazardous materials in our inventory:

Riverside Tool Corp. has found one item in our inventory which contained Tetrachloroethylene and/or Dichloromethane. This item is an 19 or 20 oz. aerosol can of Chlorinated Brake Cleaner. The aerosol spray is used for machine clean-up as a part of routine maintenance. Some overspray likely occurs to the concrete that surrounds the machines/parts during application; however washdown of the area on a routine basis minimizes any build-up of the aerosol contents over time. Use of the aerosol has always been performed inside of the building (overspray to an impermeable surface), and use has been limited (i.e., no more than 20 cans in stock at any given time, aerosol application from 19 or 20 ounce can).

Riverside's average per-year consumption of Chlorinated Brake Cleaner is 83 cans with a chlorinated solvent content of 60% by weight, and some variations as low as 15% by weight.

A table of information relating to the general terms, nature, and quantity of the hazardous substances found in our inventory is enclosed as Attachment 7.

b.

- AMMONIUM BIFLUORIDE - CAS 1341497 - Liquid
- BENZENE - CAS 71432 - Liquid
- Beryllium - CAS 7440417 - Solid
- CADMIUM - CAS 7440439 - Solid (In battery)
- CHROMIUM - CAS 7440473 - Solid (In alloys and powder)
- COPPER SULFATE - CAS 7758987 - Liquid
- Dichloromethane - CAS 75092 - Liquid (Aerosol)
- DIPHENLMETHAN DIISOCYANATE - CAS 101688 - Liquid
- ETHYLBENZENE - CAS 100414 - Liquid
- HEXANE - CAS 110543 - Liquid
- Hydrogen Chloride - CAS 7647010 - Liquid
- Lead - CAS 7439921 - Solid
- Nickel - CAS 7440020 - Solid
- Nickel (II) Chloride (1:2) - CAS 7718549 - Liquid
- NICKEL HYDROXIDE - CAS 12054487 - Solid (In Battery)
- PENTYL ACETATE - CAS 628637 - Liquid (Aerosol)
- Phosphoric Acid - CAS 7664382 - Liquid
- Phosphorous - CAS 7723140 - Solid
- Potassium Hydroxide - CAS 1310583 - Liquid, Solid (In Battery)
- Silver - CAS 7440224 - Solid
- SODIUM BISULFITE - CAS 7631905 - Liquid
- Sodium Hydroxide - CAS 1310732 - Liquid, Powder
- Sodium Hypochlorite - CAS 7681529 - Liquid

- Sodium phosphate, tribasic (TSP) © - CAS 7601549 - Liquid
- Sodium Tripolyphosphate - CAS 7758294 - Liquid, Powder
- Sulfuric Acid - CAS 7664939 - Liquid
- Tetrachloroethylene - CAS 127184 - Liquid (Aerosol)
- TOLUENE - CAS 108883 - Liquid
- XYLENES - CAS 1330207 - Liquid

c.

- AMMONIUM BIFLUORIDE - P & A Sales
- BENZENE - Various Gas Stations
- Beryllium - Alcoa, Menards
- CADMIUM - Various Battery Retailers
- CHROMIUM - Kaiser Aluminum, Crobalt, Wall Colmonoy, Schupan
- COPPER SULFATE - P & A Sales
- Dichloromethane - MSC Industrial Supply Co, Fastenal
- DIPHENLMETHAN DIISOCYANATE - Uline, Sealed Air
- ETHYLBENZENE - Various Gas Stations
- HEXANE - Various Gas Stations
- Hydrogen Chloride - Menards, Sams Club
- Lead - Kaiser Aluminum, McMaster Carr
- Nickel - Alcoa, Crobalt, Eagle International, Lucas Milhaupt, The Prince/Izant Company
- Nickel (II) Chloride (1:2) - P & A Sales
- NICKEL HYDROXIDE - Various Battery Retailers
- PENTYL ACETATE - MSC Industrial Supply Co, Fastenal
- Phosphoric Acid - Meredith Machinery, PMS Products, Inc.
- Phosphorous - Crobalt, Eagle International, MSC Industrial Supply Co, Fastenal
- Potassium Hydroxide - Birchwood Casey, PMS Products, Inc., Various Battery Retailers
- Silver - Eagle International, Lucas Milhaupt, Inc., The Prince/Izant Company
- SODIUM BISULFITE - P & A Sales
- Sodium Hydroxide - Sprayway, Birchwood Casey, Moon's Saw Shop Supplies
- Sodium Hypochlorite - Sam's Club, Menards
- Sodium phosphate, tribasic (TSP) - Beaver Research Company
- Sodium Tripolyphosphate - CAS 7758294 - Beaver Research Company, Moon's Saw Shop Supplies
- Sulfuric Acid - P & A Sales
- Tetrachloroethylene - MSC Industrial Supply Co, Fastenal
- TOLUENE - MSC Industrial Supply Co, Various Gas Stations
- XYLENES - Various Gas Stations

d.

- AMMONIUM BIFLUORIDE - Used in electroplating, stored in poly bucket, has never been disposed of.
- BENZENE - Purchased in the form of Gasoline for facility maintenance.

- Beryllium - Present in 6061 aluminum in solid form that is machined to produce cutting tools, chips are collected and sent to Omnisource, Inc. of Elkhart as scrap. Also small quantity present in sandblasting abrasive.
- CADMIUM - Present in various NiCad batteries around the facility in tools and exit signs, emergency lights, etc.
- CHROMIUM - Present in materials such as Aluminum and Crobalt alloy that is raw material for finished parts. Chips and scrap are collected and sent for recycling. Also present in cutting tools used to machine parts.
- COPPER SULFATE - Used in electroplating process. Use does not result in generation of any wastes.
- Dichloromethane - Present in aerosol cans of Chlorinated Brake Cleaner. Used for machine maintenance and miscellaneous cleaning.
- DIPHENLMETHAN DIISOCYANATE - Present in sealed packets that expand with internal foam when activated for packing parts in shipping boxes.
- ETHYLBENZENE - Purchased in the form of Gasoline for facility maintenance.
- HEXANE - Purchased in the form of Gasoline for facility maintenance.
- Hydrogen Chloride - Present in toliet bowl cleaner that is used for facility maintenance and cleaning.
- Lead - Present in alloys that Aluminum alloys can contain and some cutting tools used to produce finished parts. Also present in lead tape used in electroplating process. All scraps are held and sent out for recycling.
- Nickel - Present in raw materials used to make finished parts, grinding wheels, sand-blasting abrasive, brazing materials, and cutting tools used to produce finished parts. All scraps are held and sent for recycling. Grinding wheel abrasive gradually wears off into machine sumps in which the liquid is retained within a disposal tote and pumped by Safety Kleen for proper treatment and disposal.
- Nickel (II) Chloride (1:2) - Used in electroplating process. Use does not result in generation of any wastes.
- NICKEL HYDROXIDE - Present in various NiCad batteries around the facility in tools and exit signs, emergency lights, etc.
- PENTYL ACETATE - Used in aerosol form to spray small parts before brazing process. Overspray evaporates completely upon application.
- Phosphoric Acid - Used sparingly for cleaning rust or mineral deposits from machines.
- Phosphorous - Present in raw materials used to make finished parts, grinding wheels, and cutting tools used to produce finished parts. All scraps are accumulated and sent for recycling. Grinding wheel abrasive gradually wears off into machine sumps in which the liquid is retained in a disposal tote and pumped by Safety Kleen for proper off-site treatment and disposal.
- Potassium Hydroxide - Present in black oxide process which has all waste liquid transferred to a disposal tote which is pumped out by Safety Kleen for proper off-site treatment and disposal. Also present in cleaner used on tools that are being serviced, with liquid generated by the process transferred to a disposal tote. Was used at one time

in brazing process but is no longer in use. Also present in various NiCad batteries around the facility.

- Silver - Present in raw materials used to make finished parts, grinding wheels and brazing supplies. All scraps are accumulated and sent for recycling. Grinding wheel abrasive gradually wears off into machine sumps in which the liquid is retained in a disposal tote and pumped by Safety Kleen for proper treatment and disposal.
- SODIUM BISULFITE - Used in electroplating process. Use does not result in generation of any wastes.
- Sodium Hydroxide - Present in black oxide process which has all waste liquid transferred to a disposal tote which is pumped out by Safety Kleen for proper treatment and disposal. Also used to clean tools sent to the Site for service, with all liquid transferred to the disposal tote.
- Sodium Hypochlorite - Used to clean bathrooms and other miscellaneous cleaning.
- Sodium phosphate, tribasic (TSP) - No longer in use. Was used for miscellaneous machine cleaning.
- Sodium Tripolyphosphate - CAS 7758294 - Was used for miscellaneous machine cleaning (no longer used for that purpose). Is in use to clean tools sent to the Site for service, all liquid is retained within a disposal tote which is pumped out by Safety Kleen for proper treatment and disposal.
- Sulfuric Acid - Used in electroplating process. Never disposed of.
- Tetrachloroethylene - Present in aerosol cans of Chlorinated Brake Cleaner. Used for machine maintenance and miscellaneous cleaning.
- TOLUENE - Purchased in the form of Gasoline for facility maintenance.
- XYLENES - Purchased in the form of Gasoline for facility maintenance.

e.

The listed hazardous substances have been in use since Riverside Tool Corp. moved to the subject site in 2004.

f.

As noted the building Riverside Tool Corp. occupies was constructed with concrete flooring (as an impermeable surface), and great care is taken to make sure that the use of any hazardous materials occurs away from any existing floor drains so as to avoid any potential point of entry to the subsurface environment. At no time are there any process related activities conducted outside of the building. Care is also taken to periodically clean (mop) the work areas with liquids being discharged to a designated waste tote.

g.

- AMMONIUM BIFLUORIDE - Comprises <1% of 15 gallons purchased.
- BENZENE - Unknown quantity since records are not kept for gasoline purchases.
- Beryllium - Unknown quantity because aluminum alloys vary per order; records are not available to determine which aluminum orders contained beryllium, however beryllium would only comprise of .00036 to .002 percent of the aluminum.

- CADMIUM - Records are not available for which exit signs or emergency lights have NiCad batteries present. There are currently an estimated 3-5 power tool batteries that contain NiCad batteries.
- CHROMIUM - Unknown quantity because aluminum alloys vary per order; records are not available to determine which aluminum orders contained chromium, however chromium would only comprise of .1 to .36 percent of the aluminum. The Crobalt raw material product contains 25-30% Chromium but our records do not indicate a weight of the item per order so we are unable to quantify the amount of Chromium purchased. We have purchased approximately 12 gallons of Nicrobraz LM product which is 5-10% chromium since 2004. Our orders of taps and dies do not indicate in our records if they contained Chromium or their weight so we are unable to calculate our consumption of chromium within taps and dies.
- COPPER SULFATE - Comprises 1-3% of the 30 gallons purchased since 2004.
- Dichloromethane - Total of 497 aerosol cans (19 ounces) of Chlorinated Brake Cleaner containing Dichloromethane were purchased since 2004. Dichloromethane comprises 30-60% of each can of Chlorinated Brake Cleaner.
- DIPHENLMETHAN DIISOCYANATE - Records are not immediately available to indicate the quantity of Sealed Air Instapaks purchased. Diphenlmethan Diisocyanate comprises less than 1% of the product.
- ETHYLBENZENE - Unknown quantity since records are not kept for gasoline purchases.
- HEXANE - Unknown quantity since records are not kept for gasoline purchases.
- Hydrogen Chloride - Records are not kept for cleaning miscellaneous products.
- Lead - Unknown quantity because aluminum alloys vary per order; records are not available to determine which aluminum orders contained lead, however lead would only comprise of .1 to 2 percent of the aluminum. Our orders of taps and dies do not indicate if they contained Lead, or their weight; so we are unable to calculate our consumption of Lead within taps and dies. Our orders of lead foil tape do not indicate the weight so we do not have records of the consumption of lead foil tape.
- Nickel - Unknown quantity because aluminum and tool steel alloys vary per order; records are not available to determine which aluminum/steel orders contained nickel, however nickel would only comprise of 1.5 percent of the aluminum or .01-4.0% of the tool steel. The Crobalt raw material product contains 1-5% nickel;however, our records do not indicate a weight of the item per order so we are unable to quantify the amount of nickel contained in crobalt purchased. We have purchased approximately 12 gallons of Nicrobraz LM product which is 60-100% nickel since 2004. Records are not available for which exit signs or emergency lights have NiCad batteries present. There are currently an estimated 3-5 power tool batteries that contain NiCad batteries. Silver brazing alloys do not have records available that indicate the weight so we are unable to calculate our consumption.
- Nickel (II) Chloride (1:2) - 30 gallons since 2004 (15% Nickel Chloride).
- NICKEL HYDROXIDE - Records are not available for which exit signs or emergency lights have NiCad batteries present. There are currently an estimated 3-5 power tool batteries that contain NiCad batteries.

- PENTYL ACETATE - Estimated 312 cans per year comprised of 1-5% pentyl acetate. Riverside Tool Corp. began using the product in 2005.
- Phosphoric Acid - Only 2 gallons of AC500 has ever been purchased (45-55% Phosphoric Acid). 12 8oz bottles of Rust Free have been purchased per year since 2004(<30% Phosphoric Acid)
- Phosphorous - The Crobalt raw material product contains .001-.02% phosphorous but our records do not indicate a weight of the item per order so we are unable to quantify the amount of phosphorous contained in Crobalt purchased. Our orders of taps and dies do not indicate if they contained phosphorous or their weight, so we are unable to calculate our consumption of phosphorous within taps and dies.
- Potassium Hydroxide - Riverside purchases on average 15 gallons of Safe Scrub per year (20% Potassium Hydroxide). Blade & Bit averages 33.5 gallons per year of the product. Some of it is resold and some of it is used internally. (<5% Potassium Hydroxide). We have no records of our consumption of Daraclean 282 GF and are not sure if we ever consumed more than a sample of the product (1-5% Potassium Hydroxide). Records are not available for which exit signs or emergency lights have NiCad batteries present. There are currently an estimated 3-5 power tool batteries that contain NiCad batteries (<3% Potassium Hydroxide).
- Silver - Silver brazing alloys and Eagle grinding wheels do not have records available that indicate the weight, so we are unable to calculate our consumption.
- SODIUM BISULFITE - 15 gallons of Metal Activator since 2004 (7% Sodium Bisulfite)
- Sodium Hydroxide - 15 gallons of Electroscrub since 2004 (17% Sodium Hydroxide.), 12 aerosol cans of Saw Cleaner Pitch and Gum Remover per year since 2004 (5-8% Sodium Hydroxide), 27.5 gallons of Tru Temp XL Blackener per year since 2004 (30% Sodium Hydroxide), Less than 1 per year of X10 since 2004 (concentration N/A).
- Sodium Hypochlorite - Records are not kept for cleaning miscellaneous products.
- Sodium phosphate, tribasic (TSP) - 60 gallons of S722 since 2004 (concentration N/A)
- Sodium Tripolyphosphate -60 gallons of S722 since 2004 (concentration N/A), Less than 1 per year of X10 since 2004 (concentration N/A).
- Sulfuric Acid - 15 gallons of Bright Copper Make Up (<1% Sulfuric Acid), 15 gallons of Electrostrip (95% Sulfuric Acid)
- Tetrachloroethylene - 325 cans of aerosol chlorinated brake cleaner since 2004 (20 oz cans with 15% concentration of Tetrachloroethylene). 497 cans of aerosol chlorinated brake cleaner since 2004 (19 oz cans with 30-60% concentration of Tetrachloroethylene)
- TOLUENE - Unknown quantity since records are not kept for gasoline purchases.
- XYLENES - Unknown quantity since records are not kept for gasoline purchases.

Question 7

Riverside Tool Corp. has been inspected by the Elkhart Fire Department in July of 2011 and June of 2014. A copy of the inspection reports have been included as Attachment 8. All the

issues found were quickly resolved and upon any fire inspectors return visit no further issues were identified.

Riverside has also been inspected by the Elkhart County Health department on 8/24/2009 and 1/13/2013. Both inspection records have been included in Attachment 9. Neither inspection found any environmental concerns, and both were classified as routine.

In April of 2011 Riverside was inspected by the City of Elkhart Public Works & Utilities Wastewater Department. The purpose of the inspection was to determine if Riverside Tool Corp. discharged any process wastes into the municipal sewer from any of our processes. The inspection found no direct discharge of process wastes; however Riverside Tool Corp. was requested to complete an Industrial Wastewater Discharge Permit Application as verification that a permit was not required. A copy of that application has been included as Attachment 6.

Question 8

Other than the miscellaneous issues found in the July 2011 fire safety inspection (As covered in Question 7), no violations, citations, deficiencies and/or accidents have occurred at the Site since Riverside Tool Corp. has occupied the Site.

Question 9

Riverside Tool Corp. does not hold any environmental permits from local, state, or federal agencies.

Question 10

No, Riverside Tool Corp. has never filed a Hazardous Waste Activity Notification.

Question 11

No, the Site has never had an "interim status" under the Resource Conservation or Recovery Act.

Question 12

As previously mentioned in other questions, a copy of the Phase 1 and Phase 2 site surveys and other previous site surveys (performed on the Site but for other companies) are enclosed (Attachment 1) for your review.

Question 13

Riverside Tool Corp. knows of no release of hazardous substances at the site.

Question 14

Riverside Tool Corp. knows of no leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants.

Question 15

Riverside Tool Corp. knows of no spill, leak, release, or discharge of hazardous substances into any subsurface disposal system or floor drain inside or under any building located at the Site.

Question 16

Riverside Tool Corp. knows of no soil excavations or removal activities having been performed at the site during our period of operation at the site.

Question 17

All records of audits and correspondence available from Riverside Tool Corp.'s insurance companies have been enclosed in Attachment 10.

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I certify under a penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant

penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Ronald Migedt, President of Riverside Tool Corp.